

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

HILLTOP CHURCH OF THE  
NAZARENE,

Plaintiff,

V.

CHURCH MUTUAL INSURANCE  
COMPANY,

Defendant.

CIVIL ACTION NO. 6:21-CV-00322-JCB

**JOINT NOTICE OF AGREED EXTENSION OF DISCOVERY DEADLINE**

Plaintiff Hilltop Church of the Nazarene and Defendant Church Mutual Insurance Company jointly file this Notice of Agreed Extension of Discovery Deadline to advise the Court of the parties' stipulation to extend the discovery deadline through and until June 13, 2022.

The Court’s October 13, 2021 Scheduling Order provides for a May 13, 2022 discovery deadline. The Order further states that “[t]he parties may agree to extend this discovery deadline, provided that (1) the extension does not affect the trial setting, dispositive-motions deadline, challenges to experts deadline, or pretrial submission dates; and (2) the parties joint file with the court written notice of the extension.”

Due to various scheduling issues, the parties have agreed to extend the discovery deadline through and until Monday, June 13, 2022. The agreed extension leaves the parties with more than sufficient time to evaluate and draft dispositive and/or *Daubert* motions prior to the August 8, 2022 deadline for such motions and will accordingly not affect that deadline. The extension will also not affect the November 14, 2022 trial setting.

Respectfully submitted,

By: /s/ Vincent P. Circelli  
Preston J. Dugas III  
State Bar No. 24050189  
[pdugas@dcclawfirm.com](mailto:pdugas@dcclawfirm.com)  
Vincent P. Circelli  
State Bar No. 24058804  
[vcircelli@dcclawfirm.com](mailto:vcircelli@dcclawfirm.com)  
**DUGAS, CHEEK & CIRCELLI,  
PLLC**  
1701 River Run, Suite 703  
Fort Worth, TX 76107  
Telephone: 817-945-3061  
Facsimile: 682-219-0761

**ATTORNEYS FOR PLAINTIFF**

-and-

By: /s/ Kiri D. Deonarine  
G. Brian Odom  
State Bar No. 50511840  
[bodom@zelle.com](mailto:bodom@zelle.com)  
Lindsey P. Bruning  
State Bar No. 24064967  
[lbruning@zelle.com](mailto:lbruning@zelle.com)  
Kiri D. Deonarine  
State Bar No. 24105298  
[kdeonarine@zelle.com](mailto:kdeonarine@zelle.com)  
**ZELLE LLP**  
901 Main Street, Suite 4000  
Dallas, TX 75202-3975  
Telephone: 214-742-3000  
Facsimile: 214-760-8994

**ATTORNEYS FOR DEFENDANT  
CHURCH MUTUAL INSURANCE  
COMPANY**

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing has been served on the following counsel of record in accordance with FEDERAL RULES OF CIVIL PROCEDURE on this 12th of May 2022:

Preston J. Dugas III  
State Bar No. 24050189  
[pdugas@dcclawfirm.com](mailto:pdugas@dcclawfirm.com)  
Vincent P. Circelli  
State Bar No. 24058804  
[vcircelli@dcclawfirm.com](mailto:vcircelli@dcclawfirm.com)  
**DUGAS, CHEEK & CIRCELLI, PLLC**  
1701 River Run, Suite 703  
Fort Worth, TX 76107  
Telephone: 817-945-3061  
Facsimile: 682-219-0761

**ATTORNEYS FOR PLAINTIFF**

/s/ Lindsey P. Bruning

Lindsey P. Bruning